

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
In re:)	CIVIL ACTION NO. 05-11177-DPW
M3POWER RAZOR SYSTEM)	(LEAD CASE)
MARKETING & SALES PRACTICES)	
LITIGATION)	MDL Docket No. 1704
_____)	
)	
THIS DOCUMENT RELATES TO:)	
ALL CASES)	
_____)	

**JOINT MOTION FOR SUSPENSION OF THE SCHEDULE
IN THE SCHEDULING ORDER OF MARCH 7, 2006**

Plaintiffs' Co-Lead Counsel and counsel for defendant The Gillette Company ("Gillette"), having been engaged in settlement discussions pursuant to the Scheduling Order of March 7, 2006 ("Counsel are encouraged to seek an early resolution of this matter.") and Case Management Order #2, ¶¶ 2.a.(ii) and 2.a.(xii), hereby jointly report to the Court that their discussions have reached the point where they have executed a Non-Binding Memorandum of Understanding reflecting most of the essential terms of a settlement, such that they believe settlement is likely and that litigation proceedings should be suspended so as to permit counsel to negotiate definitive documentation of a settlement.

Plaintiffs' Co-Lead Counsel and counsel for Gillette accordingly jointly move for a suspension of the schedule in the Scheduling Order of March 7, 2006, and should the Court request, are prepared to appear before the Court for a conference at the Court's earliest convenience to permit Plaintiffs' Co-Lead Counsel and counsel for Gillette to report further to the Court as to the status of such discussions and the basis for their request for a suspension.

Dated: July 28, 2006

Respectfully submitted,

/s/ Mark P. Szpak

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (“NEF”) and paper copies will be sent to those indicated as nonregistered participants on the 28th day of July, 2006.

/s/ Thomas G. Shapiro
Thomas G. Shapiro